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March 22, 2005

Hearing Clerk
U.S. Department of Agriculture
Room 1081-S
Washington, DC 20250-9200

Re: Docket No. AO-F&V-991-A3; FV03-991-01
Federal Register Vol. 70, No. 36, Thursday, Feb. 24, 2005

To Whom It May Concern:

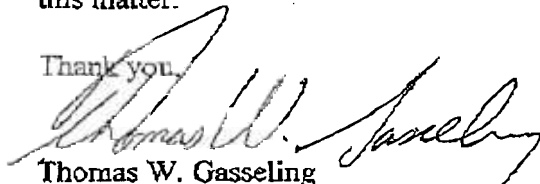
As President of Leo Gasseling & Sons, Inc, it has always been my position that the most current and fair production years be used for the representative base period. The original proposal put forth by the Proponents Committee utilized this method, taking into consideration years where market conditions, weather, pests and disease affected growers' production. After numerous lengthy delays, in the process, the Proponents Committee revised the proposal by adding an additional year so that the procedure used to determine the representative base period would continue to reflect the most current and fair years.

Given that the Department of Agriculture is only considering and asking for comments on two possible representative base periods, both of which would be acceptable, I would like to go on record supporting the second alternative namely "the six most recent crop years preceding the implementation of any order".

Using the most recent years was a big issue for the opponents during the Hearing process and I think the second alternative more than fairly addresses their concerns.

I would encourage the Department to bring this process to a conclusion as soon as possible, because the lengthy delay in arriving at a decision and the subsequent uncertainty it caused has had a very negative impact on our industry. Regardless of the outcome, it is time for closure on this matter.

Thank you,


Thomas W. Gasseling
President - Leo Gasseling & Sons, Inc.